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July 15, 2004

## **VIA ELECTRONIC FILING**

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Re: WC Docket No. 04-36: Erratum for Reply Comments of Callipso Corporation

Dear Ms. Dortch:

On July 14, 2004, Callipso Corporation submitted its Reply Comments in this docket. The first sentence of the Executive Summary (Page ii), included a minor typo - "it" should be replaced with "if." A corrected Page ii is attached hereto. Please substitute the attached document for Page ii of the filing.

I apologize for any confusion this inadvertent error may have caused. Should you have any questions, please do not hesitate to contact me.

Respectfully submitted,

/S/

Michael P. Donahue

Counsel for Callipso Corporation

Enclosure

## EXECUTIVE SUMMARY

Voice over Internet Protocol (“VoIP”) is rapidly becoming consumers’ best, if not sole, competitive option to the RBOCs’ traditional voice service, in light of the continuing decline of the CLEC market. Over the past few years, there has been a significant decline in the availability of products and services that compete with the monopoly RBOCs. Without immediate action from the Commission promoting the development of VoIP, consumers will be denied a viable competitive alternative in the local communications service market.

The Commission must promptly state that Internet Protocol (“IP”) traffic terminating to the public switched telephone network (“PSTN”) remains an enhanced service entitled to the Commission’s ESP exemption from access charges and that providers of VoIP remain entitled to obtain the circuits necessary to transmit such traffic from the LECs’ retail tariffs. Alternatively, the Commission should establish a just and reasonable price for the use of such facilities by VoIP providers.

RBOCs are improperly claiming that there is an absence of specific guidelines on how IP-enabled services are treated for intercarrier compensation purposes and as a result dictate an outcome that favors RBOCs at the expense of VoIP providers and consumers. Aside from engaging in illegal self-help measures as it pertains to the compensation for exchanged traffic, RBOCs are also imposing their own overly broad interpretation of the *AT&T Order* on CLECs to either deny VoIP providers access to PRIs or other circuits necessary to reach the PSTN or to collect access charges for the use of those facilities. As a result of the RBOCs actions, CLECs have either refused to provide or have substantially increased their rates for the facilities on which VoIP providers rely in order to connect to the PSTN. Consequently, VoIP providers no longer have access to the facilities necessary to connect to the PSTN and bring their competitive, innovative services to consumers.